

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:) Chapter 11
)
EBRO FOODS, INC.) Judge Eugene Wedoff
)
Debtor and Debtor in Possession.) Case No. 09-10101
)
) Hearing: April 22, 2009 at 9:30 AM

NOTICE OF MOTION

To: See attached service list

PLEASE TAKE NOTICE that on April 22, 2009 at 9:30 AM, the undersigned will appear before the Honorable Eugene R. Wedoff, Bankruptcy Judge, in Courtroom 744, Dirksen Federal Building, 219 S. Dearborn, Chicago, Illinois the Bankruptcy Court for the Northern District of Illinois, Eastern Division, and shall then and there present **APPLICATION TO EMPLOY ATTORNEYS FOR DEBTOR**, a copy of which is enclosed herewith and served upon you.

/s/ Forrest L. Ingram

Forrest L. Ingram #3129032
Peter L. Berk
Patrick Lambe
Helena Milman
Gautham Kaveti
Forrest L. Ingram P.C.
79 West Monroe, Suite 900
Chicago, Illinois 60603
(312) 759-2838

CERTIFICATE OF SERVICE

I, Forrest L. Ingram, an attorney, certify that I have served a true and correct copy of the above and foregoing notice and the documents to which it refers on those whose names appear on the attached services list by electronic case filing, or by US Mail, as indicated on the list, on **April 17, 2009**, before the hour of 5 p.m.

/s/Forrest L. Ingram

SERVICE LIST

Via U.S. Mail

Debtor

Ebro Foods, Inc.
1330 W. 43rd St.
Chicago, IL 60609

Via CM/ECF and Fax

US Trustee

William T. Neary
Office of the United States Trustee
Northern District of Illinois
219 S. Dearborn St., Room 873
Chicago, IL 60604

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APPLICATION TO EMPLOY ATTORNEYS FOR DEBTOR

NOW COMES the Debtor and Debtor in Possession EBRO FOODS, INC. (the “Debtor”), and applies to this Honorable Court for authority to employ Forrest L. Ingram, Peter L. Berk, Patrick Lambe, Helena Milman, and Gautham Kaveti, of the law firm of Forrest L. Ingram, P.C. (hereinafter “**FORREST L. INGRAM, P.C.**”), as attorneys for the Debtor, for these reasons:

1. On March 24, 2009, Debtor filed a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code.
2. Debtor remains in possession of its assets and continues to conduct its business pursuant to 11 U.S.C. §§ 1107 and 1108.
3. Debtor will need to be represented by competent Chapter 11 counsel, and to that end seeks to employ the attorneys of **FORREST L. INGRAM, P.C.** on a security retainer of \$20,000.00 as their attorneys, in accordance with the Engagement Agreement attached hereto as **Exhibit A**. The hourly rates of the attorneys of Forrest L. Ingram, P.C. are disclosed on the Engagement Agreement, and are \$440 per hour for Forrest L. Ingram, \$275 per hour for Peter L. Berk, \$225 per hour for Patrick Lambe, \$200 per hour for Helena Milman, and \$175 for Gautham Kaveti. The hourly rate of all law clerks is \$90.

4. **FORREST L. INGRAM, P.C.** has considerable experience in Chapter 11 proceedings and therefore is well qualified to represent the Debtor and Debtor in Possession. Among the many Chapter 11 Debtors whom the attorneys of **FORREST L. INGRAM, P.C.** have represented are: Del Ricco Brothers Construction, Inc., 88 B 13909 (confirmed); American Underground Engineering, Inc., 88 B 18726 (confirmed); Gojko and Andjelka Ilic, 92 B 14006 (confirmed); Spiers Graff Spiers [a partnership], 93 B 9928 (confirmed) Dr. Galo L. Tan, M.D.S.C. 95 B 25772 (confirmed); Emerald Sewer and Plumbing, 97 B 17793 (confirmed); Midwest Imports International, Inc., 97 B 7826 (confirmed); Chicago Security, Inc., 96 B 8254 (confirmed); Career Dimensions, Inc. 97 B 5418 (confirmed); Michael Kuchejda, 99 B 13732 (confirmed); Marjorie Lynn Mungo, 00 B 20606 (confirmed); Headline Promotions, Inc., 00 B 24010 (confirmed); James E. Collins, 00 B 6016 (confirmed); A&K Construction Co., Inc., 01 B 20980 (confirmed); Stanley and Lillian Golba, 01 B 04142 (confirmed); Zepeda Construction Services, Inc., 02 B 18501 (confirmed), Richard and Pamela Kortan, 07 B 07395 (confirmed), and David Kortan, 07 B 18547 (confirmed).

5. It is in the best interests of the estate of the Debtor and their creditors that the Debtor and Debtor in Possession be authorized to employ **FORREST L. INGRAM, P.C.** to represent the Debtor and Debtor in Possession in these proceedings.

6. **FORREST L. INGRAM, P.C.** will render professional services, as follows:

- a. To advise and consult with the Debtor about its legal status and obligations and duties as Debtor in Possession;
- b. To aid the Debtor in negotiations with its creditors and in the drafting of a Plan of Reorganization;
- c. To advise and consult with the Debtor regarding claims that may be inappropriately filed or in error filed and to prepare and litigate objections thereto;
- d. To prepare motions, applications, and other court papers and to appear before the Court regarding such matters as set forth in said court papers and to seek relief in

accordance with said court papers, together with the preparation of the necessary orders thereto;

- e. To defend actions that may be instituted against the Debtor in these proceedings, and to litigate matters relating to said proceedings; and
- f. To perform and do all legal services that may be required by the Debtor in connection with, among other things, preserving the property of the estate and other activities incident to these proceedings.

7. **FORREST L. INGRAM, P.C.** will not render any accounting services to the Debtor, nor will it prepare or file any tax returns on behalf of the Debtor.

8. To the best of their knowledge, **FORREST L. INGRAM, P.C.** and its attorneys have no material connection with the Debtor, its creditors or any other parties in interest or its respective attorneys. See the attached Affidavit of Proposed Attorney.

WHEREFORE, the Debtor and Debtor in Possession pray that they be authorized, pursuant to 11 U.S.C. § 327(a), to employ Forrest L. Ingram, Peter L. Berk, Patrick Lambe, Helena Milman, and Gautham Kaveti of **FORREST L. INGRAM, P.C.**, on a retainer of \$20,000.00 to represent the Debtor and Debtor in Possession in this Chapter 11 case in accordance with the attached Engagement Agreement.

Respectfully submitted,
EBRO FOODS, INC.

By: /s/ Forrest L. Ingram
One of its attorneys

Forrest L. Ingram , #3129032
Peter Berk
Patrick Lambe
Helena Milman
Gautham Kaveti
Forrest L. Ingram, P.C.
79 West Monroe Street, Suite 900
Chicago, IL 60603-4907
(312) 759-2858
(312) 759-2838 fx
fingram@fingramlaw.com